

To: Gravatt, Dan[Gravatt.Dan@epa.gov]
Cc: 'Bob Jelinek'[bobjelinek@emsidenver.com]; 'Muenks, Shawn'[shawn.muenks@dnr.mo.gov]; branden.doster@dnr.mo.gov[branden.doster@dnr.mo.gov]; Tapia, Cecilia[Tapia.Cecilia@epa.gov]; 'Merrigan, Jessie (LG)'[JMerrigan@LATHROPGAGE.COM]; 'Neitzel, Charlotte'[Charlotte.Neitzel@bryancave.com]; 'Whitby, Kathleen'[kwhitby@spencerfane.com]; 'Victoria Warren'[vwarren@hrtc.net]; 'Bob Jelinek'[bobjelinek@emsidenver.com]; 'Mike Bollenbacher'[mikeb@auxier.com]
From: Paul Rosasco
Sent: Wed 5/22/2013 12:08:45 AM
Subject: RE: Fence Installation and radiation screening
[082009071-plan-with-Fence-fig2.pdf](#)
[Excerpts from A&A Procedure Manual 20130521 .pdf](#)
[HSP Fencing West Lake LF 5-21-13.pdf](#)

Dan,

In response to your request, attached please find the following items:

1. Final fence alignment figure (changes were made to address possible vehicle safety issues and to make the alignments consistent with the property boundaries);
2. A brief write up (below) and an SOP for performing radiological field screening along the fence alignment; and
3. The Health and Safety Plan.

With respect to the field screening of the alignment, Auxier is planning on using a scintillation detector to measure gamma radiation to identify any possible radiological anomalies along the proposed fence alignment. They normally compared the results to a value that is 3 to 5 times background but for this project they will be using 3 times background as the criteria. Background will be based on the median value obtained from a survey of areas outside of Areas 1 and 2.

The field screening of the alignment is just that, a field screening. Auxier was planning on obtaining a background value as described above and then walking the alignment and comparing the results to the background value as they did so. If they found anything greater than three time background, they would identify such an area to us (Bo Jelinek of my office will be on-site while they are doing this work) as we would need to make a field modification to the fence location. If that happens I would notify you as it would change the alignment and could affect the schedule

for the work. Otherwise I did not expect that any graphic or other type of summary of the results would be prepared as the data are only intended for health and safety purposes. We do not anticipate using this data to define the extent of RIM or for any other purpose.

From: Gravatt, Dan [mailto:Gravatt.Dan@epa.gov]
Sent: Tuesday, May 21, 2013 5:55 AM
To: 'Paul Rosasco'
Cc: 'Bob Jelinek'; 'Muenks, Shawn'; branden.doster@dnr.mo.gov; Tapia, Cecilia
Subject: RE: Fence Installation and radiation screening

Paul, please provide MDNR's requested SOP and/or procedure for the radiological screening, and the screening criteria, as part of the Health and Safety Plan. I would like to see the HASP a few days prior to the start of the fence installation work. I'd like to see any field observations and data generated by the radiation screening as well.

Sincerely,

Daniel R. Gravatt, PG

US EPA Region 7 SUPR/MOKS

11201 Renner Boulevard, Lenexa, KS 66219

Phone (913)-551-7324

Principles and integrity are expensive, but they are among the very few things worth having.

From: Muenks, Shawn [mailto:shawn.muenks@dnr.mo.gov]
Sent: Thursday, May 16, 2013 3:35 PM
To: 'Paul Rosasco'; Gravatt, Dan
Cc: Drake, Tiffany; 'Bob Jelinek'
Subject: RE: Fence Installation

Paul,

I have a couple more follow up questions. You state that Auxier will conduct radiological screening along the fence alignments to verify that the proposed fence work areas are outside of the RIM. What type of screening will be conducted? How will it be used to determine if the proposed fence work area is outside of the RIM (i.e. what are the screening criteria)? The Department reiterates that this type of information should be included in the work plan.

Thanks,

Shawn Muenks, P.E.

Missouri Department of Natural Resources

P.O. Box 176, Jefferson City, MO 65102

Ph: (573)751-3107

email: shawn.muenks@dnr.mo.gov

From: Paul Rosasco [<mailto:paulrosasco@emsidenver.com>]

Sent: Wednesday, May 15, 2013 1:01 PM

To: Muenks, Shawn; 'Gravatt, Dan'

Cc: Drake, Tiffany; 'Bob Jelinek'

Subject: RE: Fence Installation

Shawn,

To the extent that the alignment changes, we will provide an updated alignment figure. The vegetation clearing will be performed along the fence alignment which is located outside of the RIM. The figure will include both the alignment and the extent of RIM as was shown on the prior figures.

After checking with the fence contractor and with Auxier, it looks like EMSI will now be preparing the Health & Safety Plan. We are working on it right now. It will be provided to all of the contractors. There will also be a safety briefing with all of the contractors when they first arrive at the site. As all of the work will be performed outside of the RIM, we have determined

that no radiological training is needed. Auxier will also be present at the start of the fence construction activities to review health and safety procedures relative to possible radiological hazards, and conduct radiologically screening along the fence alignments to verify that the proposed fence work areas are outside of the RIM. The Health and Safety Plan will address both radiological and non-radiological hazards and procedures for worker safety. Both radiological and non-radiological hazards and procedures will be addressed during the initial safety briefings.

From: Muenks, Shawn [<mailto:shawn.muenks@dnr.mo.gov>]
Sent: Wednesday, May 15, 2013 11:17 AM
To: 'Paul Rosasco'; 'Gravatt, Dan'
Cc: Drake, Tiffany; Bob Jelinek
Subject: RE: Fence Installation

Paul,

Dan has informed me that you plan to provide an updated fence location figure once the final alignments have been identified. Would it be possible to include the vegetation clearing details you provided below along with the revised figure for inclusion in the work plan? We would also like to see documentation that the clearing will be located outside of radiologically impacted areas, if that is the case (a map showing proposed clearing areas in relation to the estimated extent of RIM would be helpful). Finally, it is our understanding that the fencing contractor will be supplying the Health and Safety Plan for this work per your responses to our comments on the Fencing and Signage Work Plan. Please be sure to provide a copy of such Health and Safety Plan bearing in mind that St. Louis Composting will also need to comply with this plan including radiological training as appropriate.

Thanks,

Shawn Muenks, P.E.

Missouri Department of Natural Resources

P.O. Box 176, Jefferson City, MO 65102

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From: Paul Rosasco [<mailto:paulrosasco@emsidenver.com>]
Sent: Wednesday, May 15, 2013 9:07 AM
To: Muenks, Shawn; 'Gravatt, Dan'
Cc: Drake, Tiffany; Bob Jelinek
Subject: RE: Fence Installation

The fence contractor needs an approximately 8-10 ft wide corridor to allow for transport of the fence materials and concrete along the alignment. We are planning on contracting St. Louis Composting to clear vegetation along the fence alignment as necessary to allow for installation of the fence. We anticipate that this will primarily occur along the northeast portion of the site along St. Charles Rock Road east of Area 2. As indicated in my e-mail, we will be meeting the surveyor and a representative of St. Louis Composting at the site on Friday to inspect the alignment with the goal of minimizing or eliminating the need to clear any larger vegetation (large trees). St. Louis Composting proposes to use a forestry mower that will cut, chip, and deposit the chipped vegetation on the ground in one step.

From: Muenks, Shawn [<mailto:shawn.muenks@dnr.mo.gov>]
Sent: Wednesday, May 15, 2013 7:26 AM
To: 'Paul Rosasco'; 'Gravatt, Dan'
Cc: Drake, Tiffany
Subject: RE: Fence Installation

Paul,

The Revised Fencing and Signage Plan did not include any provisions for vegetation clearing. How do you plan to address this?

Shawn Muenks, P.E.

Missouri Department of Natural Resources

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From: Paul Rosasco [<mailto:paulrosasco@emsidenver.com>]

Sent: Tuesday, May 14, 2013 5:44 PM

To: 'Gravatt, Dan'; Muenks, Shawn

Cc: 'Merrigan, Jessie (LG)'; 'Neitzel, Charlotte'; 'Whitby, Kathleen'; 'Victoria Warren'

Subject: Fence Installation

Dan and Shawn,

We have finalized selection of contractors and are looking towards installation of the additional fencing. My partner Bob will be on site Friday to meet with the surveyor and vegetation clearing contractor to finalize the alignments (e.g. adjust the fence locations to avoid large trees). The fence contractor plans on beginning fence installation work on Wednesday May 29th. Please let Bob or I know if you plan on being onsite for any of this work. Thanks.